1 RENE L. VALLADARES Federal Public Defender 2 State Bar No. 11479 RICK MULA 3 Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 4 Las Vegas, Nevada 89101 (702) 388-6577/Phone 5 (702) 388-6261/Fax Rick Mula@fd.org 6 Attorney for Alexander Kostan 7

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:21-cr-00081-APG-DJA

Plaintiff,

**JOINT STATUS REPORT** 

v.

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ALEXANDER KOSTAN,

Defendant.

This Court sentenced Defendant to probation with various conditions on July 22, 2021. (ECF No. 37.) One of the conditions was that Defendant complete 160 hours of community service within 24 months. (*Id.* at 4.)

U.S. Probation filed a Petition for Summons for Offender Under Supervision on February 23, 2024, alleging that Defendant violated various conditions of probation. (ECF No. 38.)

Defendant admitted to two of those violations (failing to make restitution payments and failing to complete community service) at a hearing held October 16, 2024. (ECF No. 59.) Defendant reported experiencing significant health difficulties and violence that delayed completion of community service. The Court continued Defendant on unsupervised probation for six months to allow Defendant time to complete community service requirements. (*Id.*) The

Court also ordered the parties to file a status report by January 16, 2025, regarding community service progress. (*Id.*)

Defendant continues to experience serious health difficulties, similar to those described on the record at the previous hearing. However, Defendant has applied for two remote volunteer opportunities that would allow her to complete community service while also accommodating her health difficulties and disabilities. She is awaiting approval and training for these volunteer positions.

In light of this information, and given that the six-month period has not yet expired, Defendant requests to continue on current conditions. Counsel respectfully requests that the Court set a deadline of February 14, 2025, to provide another status report.

DATED this 16th day of January, 2025.

RENE L. VALLADARES Federal Public Defender

JASON M. FRIERSON United States Attorney

By <u>/s/ Rick Mula</u>
RICK MULA
Assistant Federal Public Defender

By <u>/s/ Mina Chang</u>
MINA CHANG
Assistant United States Attorney

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

2	DISTRICT OF NEVADA	
3	UNITED STATES OF AMERICA,	Case No. 2:21-cr-00081-APG-DJA
4	Plaintiff,	<u>ORDER</u>
5	V.	
6 7	ALEXANDER KOSTAN,	
8	Defendant.	
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10	IT IS THEREFORE ORDERED that the	e parties file a joint status report regarding
11	community service progress by February 14, 2025.	
12	DATED this day of January, 2025.	
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15	UNI	TED STATES DISTRICT JUDGE
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